

**UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT OF  
TEXAS HOUSTON DIVISION**

<b>MIKUL KLEHM</b>	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Civil Action No.: 4:22-cv-01226</b>
	§	
<b>RAWLTYN JORDAN HART, ET</b>	§	
<b>Defendants.</b>	§	

**NOTICE TO COURT REGARDING MEDIATION**

Harris County files this Notice to the Court regarding Mediation. Harris County will participate in mediation *after* a ruling on the Motion for Summary Judgment (MSJ), if any claims remain.

1. This Court requires mediation or settlement conference within 45 days of filing of a summary judgment under Rule 56. (Judge Charles Eskridge Court Procedures, ¶ 32(b)).
2. Harris County filed a Motion for Summary Judgment (MSJ) on the dispositive motion deadline, January 17, 2025. DE: 88.
3. Harris County is opposed to mediation until *after* this Court rules on the MSJ.
4. This case involves allegations that Harris County violated Plaintiff's Constitutional rights, brought under 42 U.S.C. § 1983. As discussed in Harris County's MSJ, DE: 88, the Plaintiff cannot sustain a cause of action against Harris County in this case.
5. As a government entity, Harris County seeks the benefit of a ruling on the case dispositive motion before potentially spending public funds on a settlement.
6. If claims remain against Harris County after this Court has ruled on the MSJ, Harris County will mediate those claims in good faith.
7. Harris County has notified all parties involved in this case.

Date: January 24, 2025.

Respectfully submitted,

**CHRISTIAN D. MENEFEE**  
HARRIS COUNTY ATTORNEY

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DEPUTY COUNTY ATTORNEY AND FIRST  
ASSISTANT

**NATALIE G. DELUCA**  
MANAGING COUNSEL,  
DEFENSIVE LITIGATION, EMPLOYMENT, &  
REAL ESTATE DIVISIONS  
Respectfully submitted,

By: /s/     Rachel Fraser  
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**ATTORNEYS FOR DEFENDANT**  
**HARRIS COUNTY**

**CERTIFICATE OF SERVICE**

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause.

*/S/ Rachel Fraser*  
RACHEL FRASER